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10 Attorneys for Defendant TWITTER, INC.

11 UNITED STATES DISTRICT COURT
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13 NORTHERN DISTRICT OF CALIFORNIA
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15 MARIA RUTENBURG, an individual,
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17 Plaintiff,
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19 v.
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21 TWITTER, INC., a Delaware Corporation,
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23 Defendant.
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CASE NO. 4:21-CV-00548-YGR

**JOINT STIPULATION AND [PROPOSED]
ORDER TO: (1) SUBMIT STREAMLINED
BRIEFING UNDER MODIFIED DEADLINES
AND (2) CONTINUE INITIAL CASE
MANAGEMENT CONFERENCE AND
ACCOMPANYING DEADLINES**

1 Through their respective attorneys of record, Plaintiff Maria Rutenburg and Defendant Twitter,
2 Inc. hereby stipulate as follows:

3 WHEREAS, on January 26, 2021, Plaintiff filed an amended complaint in the above-captioned
4 matter (Dkt. No. 2);

5 WHEREAS, on January 27, 2021, Plaintiff filed a motion for a temporary restraining order (Dkt.
6 No. 9);

7 WHEREAS, on January 28, 2021, Plaintiff filed an *ex parte* motion to shorten time to hear her
8 motion for a temporary restraining order (Dkt. No. 10);

9 WHEREAS, on January 28, 2021, the Court issued an order denying Plaintiff's motion for a
10 temporary restraining order and denying as moot Plaintiff's *ex parte* motion to shorten time (Dkt. No.
11 11);

12 WHEREAS, undersigned counsel at Conrad | Metlitzky | Kane LLP was only recently retained to
13 represent Defendant in this matter (Yang Decl. ¶ 2);

14 WHEREAS, Plaintiff intends to renew her motion for a preliminary injunction (Yang Decl. ¶ 3);

15 WHEREAS, Defendant intends to file a motion to dismiss (*id.*);

16 WHEREAS, the Parties have met and conferred, and agree that there is substantial overlap
17 between the issues that would be raised by Plaintiff's renewed motion for a preliminary injunction and
18 Defendant's motion to dismiss (Yang Decl. ¶ 4);

19 WHEREAS, the Parties agree that it will promote efficiency and conserve the resources of the
20 Court for the Parties' respective motions to be briefed simultaneously and to be scheduled for a single
21 hearing before the Court, pursuant to the agreed-upon briefing schedule set forth below (*id.*); and

22 WHEREAS, the Parties further agree that it will also promote judicial economy to continue the
23 initial case management conference in this case (as well as associated deadlines relating to initial
24 disclosures, conferences under Rule 26(f), and ADR), until after the Court has ruled upon the Parties'
25 respective motions, and therefore request a continuance of the initial case management conference and
26 its associated deadlines by four weeks (Dkt. No. 7; Yang Decl. ¶ 5).

1 ACCORDINGLY, IT IS HEREBY STIPULATED AND AGREED between the Parties, through
 2 their counsel of record, that:

3	4	5	6	7	8	9	10	11	12	13	14	15	16	17	18	19	20	21	22	23	24	25	26	27	28
Stipulated Deadlines		Briefing and Hearings																							
February 23, 2021		Plaintiff shall file another preliminary injunction motion.																							
March 9, 2021		Defendant shall file any motion to dismiss and opposition to the second preliminary injunction motion, in a single consolidated brief that complies with Civil Local Rule 7.																							
March 23, 2021		Plaintiff shall file any opposition to the motion to dismiss and reply in support of the second preliminary injunction motion, in a single consolidated brief that complies with Civil Local Rule 7.																							
March 30, 2021		Defendant shall file any reply in support of the motion to dismiss																							
April 13, 2021, at 2:00 PM, or on another date convenient to the Court		Hearing on both the second preliminary injunction motion and motion to dismiss will take place.																							
May 10, 2021		The Parties shall have met and conferred as needed regarding: initial discloses, early settlement, ADR process selection, and discovery plan.																							
May 24, 2021		The Parties shall have done the following as needed: filed their Rule 26(f) Reports, completed initial disclosures, or stated objections in Rule 26(f) Report, and filed a Case Management Statement.																							
May 31, 2021, at 2:00 PM, or on another date convenient to the Court		An initial case management conference will take place as needed.																							

1 DATED: February 5, 2021

Respectfully submitted,

2 CONRAD | METLITZKY | KANE LLP

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5 _____
6 MARK R. CONRAD
7 GRACE YANG
8 Attorneys for Defendant

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10 DATED: February 5, 2021

JAVITCH LAW OFFICE

11 /s/ Mark L. Javitch

12 MARK L. JAVITCH
13 Attorney for Plaintiff
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SIGNATURE ATTESTATION

Pursuant to Civil Local Rule 5-1(i)(3), I hereby attest that concurrence in the filing of the document has been obtained from each signatory in this document.

DATED: February 5, 2021

Respectfully submitted,

CONRAD | METLITZKY | KANE LLP


GRACE YANG
Attorney for Defendant

[PROPOSED] ORDER

Having considered Plaintiff Maria Rutenburg and Defendant Twitter, Inc.'s (collectively, "the Parties") joint stipulation dated February 5, 2021, and for good cause appearing, the Court hereby adopts the following briefing schedule:

Stipulated Deadlines	Briefing and Hearings
February 23, 2021	Plaintiff shall file another preliminary injunction motion.
March 9, 2021	Defendant shall file any motion to dismiss and opposition to the second preliminary injunction motion, in a single consolidated brief that complies with Civil Local Rule 7.
March 23, 2021	Plaintiff shall file any opposition to the motion to dismiss and reply in support of the second preliminary injunction motion, in a single consolidated brief that complies with Civil Local Rule 7.
March 30, 2021	Defendant shall file any reply in support of the motion to dismiss
April 13, 2021, at 2:00 PM, or on another date convenient to the Court	Hearing on both the second preliminary injunction motion and motion to dismiss will take place.
May 10, 2021	The Parties shall have met and conferred as needed regarding: initial disclosures, early settlement, ADR process selection, and discovery plan.
May 24, 2021	The Parties shall have done the following as needed: filed their Rule 26(f) Reports, completed initial disclosures, or stated objections in Rule 26(f) Report, and filed a Case Management Statement.
May 31, 2021, at 2:00 PM, or on another date convenient to the Court	An initial case management conference will take place as needed.

1 **PURSUANT TO STIPULATION, IT IS SO ORDERED.**

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4 DATED: _____

The Honorable Yvonne Gonzalez Rogers
United States District Judge